

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a)	
Canadian corporation, and J-SQUARE)	
TECHNOLOGIES (OREGON) INC., an)	
Oregon corporation,)	
)	
Plaintiffs,)	
v.)	C.A. No. 04-CV-960-SLR
MOTOROLA, INC., a Delaware corporation.)	
Defendant.)	

**EXHIBIT Q TO
MOTOROLA'S RESPONSE TO PLAINTIFFS'
MOTION FOR PROTECTIVE ORDER**

YOUNG CONAWAY STARGATT & TAYLOR, LLP
/s/ William W. Bowser

William W. Bowser (Bar I.D. 2239)
The Brandywine Building, 17th Floor
1000 West Street
Wilmington, Delaware 19801
Telephone: (302) 571-6601; Facsimile: (302) 576-3282
wbowser@ycst.com
OF COUNSEL:
Randy Papetti, Cory A. Talbot, Emily S. Cates
Lewis and Roca LLP
40 N. Central Avenue
Phoenix, Arizona 85004
Telephone: (602) 262-5311
Attorneys for Defendant

CORNELL•CATANA REPORTING SERVICES, 800-170 Laurier Ave. W., Ottawa, ON K1P 5V5
Tel: (613) 231-4664 1-800-893-6272 Fax: (613) 231-4605

Examination No. 06-0288.3

Court File No. CA 04-960-SLR

(District of Delaware)

IN THE UNITED STATES DISTRICT COURT

B E T W E E N:

J-SQUARED TECHNOLOGIES, INC., a Canadian Corporation, and
J-SQUARED TECHNOLOGIES (OREGON) INC., an Oregon Corporation

PLAINTIFFS

- and -

MOTOROLA, INC. A DELAWARE CORPORATION

DEFENDANT

DEPOSITION OF CLAUDE LANGLOIS, pursuant to an appointment
made on consent of the parties to be reported by
Cornell•Catana Reporting Services, on March 22, 2006,
commencing at the hour of 9:13 in the forenoon.

APPEARANCES:

COURT COPY

Sean J. Bellow

for the Plaintiffs

Randy Papetti and Emily S. Cates

for the Defendant

This Examination was taken down by sound recording
by Janice West at Ottawa, Ontario, Canada.

CORNELL•CATANA REPORTING SERVICES, 800-170 Laurier Ave. W., Ottawa, ON K1P 5V5
Tel: (613) 231-4664 1-800-893-6272 Fax: (613) 231-4605

7

1 24. Q. What's your current position at J-Squared?

2 A. VP of Embedded Sales -- Embedded Systems --
3 excuse me.

4 25. Q. Embedded Systems Sales?

5 A. Embedded Systems Group to be very precise --
6 ESG.

7 26. Q. And you became that sometime in late 2002?

8 A. We spun off -- we spun off a new group called
9 ESG Embedded Systems Group in basically December, 2002.
10 So at that time, I left my position on the Semi-Conductor
11 side as Director of Eastern Canada and started the ESG
12 Group.

13 27. Q. Prior to starting the ESG Group for J-
14 Squared, had you ever done sales for ESG Products before?

15 A. No.

16 28. Q. You're based in Montreal?

17 A. Correct.

18 29. Q. Did you come in from Montreal for today's
19 Deposition?

20 A. Yes.

21 30. Q. Okay, thank you for doing that. I want to
22 ask you a little bit about the reporting structure
23 currently at J-Squared. You're the VP for what I'll call
24 your Group? Is that correct?

25 A. That is correct.

CORNELL•CATANA REPORTING SERVICES, 800-170 Laurier Ave. W., Ottawa, ON K1P 5V5
Tel: (613) 231-4664 1-800-893-6272 Fax: (613) 231-4605

8

1 31. Q. Who do you report to?

2 A. There's a Management Box or an Executive
3 Manager's Box which is comprised of Jeff Gibson and Mike
4 Nykoluk.

5 32. Q. So your direct reports are to Messrs. Gibson
6 and Nykoluk?

7 A. Correct.

8 33. Q. Who reports to you?

9 A. Dotted line or direct would be the likes of
10 our South East Group, our Primes in Canada which would be
11 Corey Fellows, Mark Howell, Steve Blomme.

12 34. Q. In 2003 when you first became -- or maybe
13 late 2002, excuse me -- when you first became the Vice
14 President of the ESG Group, who directly reported to you
15 then? Was there anybody at first?

16 A. Me, myself and I.

17 35. Q. Who is the first hiree? Was that Mr. Blomme?

18 A. That would have been Mr. Blomme, I believe
19 and we started transitioning people into the Group from
20 our other Groups thereafter.

21 36. Q. Tell me a little bit about what your job
22 responsibilities are now as Vice President of the ESG
23 Group?

24 A. Probably shorter to say -- or tell you what I
25 don't do.

CORNELL•CATANA REPORTING SERVICES, 800-170 Laurier Ave. W., Ottawa, ON K1P 5V5
Tel: (613) 231-4664 1-800-893-6272 Fax: (613) 231-4605

9

1 37. Q. You could start that way if it's easier?

2 A. We're a small company. Therefore we are
3 required to wear a number of hats, needless to say, so
4 from sales management, from managing our relationships
5 with the principals, from driving opportunity within our
6 sales team, administrative compensation, running after
7 commission cheques, name it -- it's a fairly wide gamut.

8 38. Q. Is forecasting one of the things you do for
9 your Group?

10 A. Forecasting -- revenue forecasting is
11 definitely something I do, yes.

12 39. Q. How about evaluating prospective new product
13 lines?

14 A. Very much so, yes.

15 40. Q. How about negotiating contracts with
16 prospective new product lines?

17 A. Yes.

18 41. Q. And any renewals?

19 A. New clients or new manufacturers?

20 A. New Manufacturers?

21 A. Yes.

22 42. Q. How about new clients?

23 A. We really don't get into contract
24 negotiations with customers.

25 43. Q. Because you're sort of a broker?

CORNELL•CATANA REPORTING SERVICES, 800-170 Laurier Ave. W., Ottawa, ON K1P 5V5
Tel: (613) 231-4664 1-800-893-6272 Fax: (613) 231-4605

10

1 A. Right.

2 44. Q. And have those job responsibilities been
3 pretty much the same -- if anything, you probably had
4 more I suppose back in 2003 than you do now?

5 A. Well I mean the extra challenge back in 2003
6 is that we have to build this Group from the ground up.

7 45. Q. So you have more people now?

8 A. More people, more lines.

9 46. Q. Could you tell me which lines currently the
10 ESG Group has?

11 A. We would have Adtron, GE Fenuk Embedded
12 Systems, Kaparel, Interphase Corporation, SMA Computers,
13 Performance Technologies, Donviam. I may be missing
14 one.

15 47. Q. They wouldn't appreciate that, but try and go
16 ahead?

17 A. Probably not. That's what I recall.

18 48. Q. If you think of any others later, tell me.
19 Those are all J-Squared -- what I call J-Squared Canada -
20 - J-Squared Technologies Inc. lines?

21 A. Specific to the Embedded Systems Group.

22 49. Q. Correct?

23 A. Yes.

24 50. Q. Is there any additional lines that J-Squared
25 (Oregon) represents?

CORNELL•CATANA REPORTING SERVICES, 800-170 Laurier Ave. W., Ottawa, ON K1P 5V5
Tel: (613) 231-4664 1-800-893-6272 Fax: (613) 231-4605

11

1 A. From a Systems Standpoint?

2 51. Q. From an ESG Standpoint, yes?

3 A. From an ESG Standpoint, we -- I'm not sure if
4 the contract's been signed with GMS. I'm not sure if the
5 contract has been executed.

6 52. Q. So that's a potential one?

7 A. That is a potential one, yes.

8 53. Q. These were all signed up, I take it, since
9 Motorola first signed up in December of 2002?

10 A. Motorola was then our starting line, yes.

11 54. Q. Have there been any others since -- besides
12 Motorola, that were ESG lines for J-Squared that are no
13 longer ESG lines for J-Squared?

14 A. AxionTech comes to mind. We've parted ways
15 with them.

16 55. Q. Action-Tech -- two words?

17 A. Axiom -- Axiom. A Taiwanese based company.

18 56. Q. Any others?

19 A. That we parted ways with -- not that I can
20 recall.

21 57. Q. Can you recall any that you entered into
22 meaningful negotiations about a prospective relationship
23 -- potential ESG lines that it didn't work out -- it
24 didn't come to fruition?

25 A. That must have happened. That must have

CORNELL•CATANA REPORTING SERVICES, 800-170 Laurier Ave. W., Ottawa, ON K1P 5V5
Tel: (613) 231-4664 1-800-893-6272 Fax: (613) 231-4605

12

1 happened. I know we had to go to bat twice with
2 Interphase. We finally did end up signing them but the
3 first pass we could not come to any Agreement.

4 58. Q. Well if you think of any others, let me know?
5 What is your relationship -- working relationship with J-
6 Squared (Oregon)? Do you oversee any of the J-Squared
7 (Oregon) employees?

8 A. They're a dotted line. That revenue gets
9 pulled into the ESG Group -- they're a dotted line into
10 the ESG. So the ESG Revenue Stream gets pulled into the
11 ESG Group.

12 59. Q. At tax time or for all purposes?

13 A. That would be a Jeff Gibson question.
14 They're different P and L's basically.

15 60. Q. They're different P and L's basically is what
16 you said? What can you recall now about how you first
17 came to learn that there was an interest potentially by
18 Motorola in signing up J-Squared to be an independent Rep
19 for Embedded Systems in Canada?

20 A. The first conversation along those lines
21 would have been between myself and Jeff most likely,
22 and/or Mike Nykoluk. That's how I found out that there
23 was an opportunity to branch out and to spin off a new
24 group. Basically they were feeling me out as to whether
25 or not I would be interested in doing so.